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Attorneys for Defendants
THE FOOTHILL-DE ANZA COMMUNITY
COLLEGE DISTRICT, DE ANZA COMMUNITY
COLLEGE, LLOYD A. HOLMES, PATRICK
AHRENS, LAURA CASAS, PEARL CHENG,
PETER LANDSBERGER, GILBERT WONG AND
ALICIA CORTEZ, THOMAS RAY, CHRISTINA
ESPINOSA-PIEB, and LYDIA HEARN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

TABIA LEE,

Plaintiff,

vs.

THE FOOTHILL-DE ANZA
COMMUNITY COLLEGE DISTRICT,
DE ANZA COMMUNITY COLLEGE,
LLOYD A. HOLMES, in his official and
individual capacity; PATRICK AHRENS,
LAURA CASAS, PEARL CHENG,
PETER LANDSBERGER, GILBERT
WONG in their official capacity; AND
ALICIA CORTEZ, THOMAS RAY,
CHRISTINA ESPINOSA-PIEB, and
LYDIA HEARN in their individual and
official capacity,

Defendants.

Case No. 5:23-cv-03418-SVK

**STIPULATION EXTENDING TIME TO
RESPOND TO COMPLAINT AND
AGREEMENT TO FILING OF AN
AMENDMENT COMPLAINT PURSUANT
TO LOCAL RULE 6-1(A) AND FEDERAL
RULE OF CIVIL PROCEDURE 15(A)(2)**

Complaint Filed: July 10, 2023
Judge: Hon. Susan Van Keulen
Courtroom: 6

IT IS HEREBY STIPULATED by and between the undersigned counsel for Plaintiff
TABIA LEE ("Plaintiff"), and the undersigned counsel for Defendants FOOTHILL- DE ANZA
COMMUNITY COLLEGE, DE ANZA COMMUNITY COLLEGE, LLOYD A. HOLMES,

1 PATRICK AHRENS, LAURA CASAS, PEARL CHENG, PETER LANDSBERGER, GILBERT
2 WONG, ALICIA CORTEZ, THOMAS RAY, CHRISTINA ESPINOSA-PIEB, and LYDIA
3 HEARN as follows:

- 4 • The parties have agreed pursuant Federal Rule of Civil Procedure 15(a)(2) that
5 Plaintiff will file an Amended Complaint. Defendants will have 14 days after
6 service of the filed Amended Complaint to file their answer or responsive
7 pleading, and that in so agreeing to permit Plaintiff to file an Amended Complaint
8 Defendants are not waiving any defenses or immunities.
- 9 • The Amended Complaint to be filed is attached as Exhibit A and a redline version
10 is attached as Exhibit B. The Amended Complaint adds a claim under Title VII of
11 the Civil Rights Act of 1964, 42 U.S.C. §2000-E et seq. and amends
12 the existing California Fair Employment and Housing Act, Cal. Gov. Code §
13 12900 et seq. claim and attaches a right to sue letter to Exhibit A. The Amended
14 Complaint to be filed also adds paragraph numbers.
- 15 • Because Defendants' time to respond to Plaintiff's initial Complaint filed July 10,
16 2023 is due September 19, 2023, the parties have also agreed under Local rule 6-
17 1(a) to extend Defendants' time to respond to Plaintiff's initial Complaint by 10
18 days to September 29, 2023, if necessary, in the absence of a superseding
19 Amended Complaint having already been filed.

1 Dated: September 18, 2023

PLAZA DE JENNINGS & CHIPMAN LLP

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3 By: /s/Jayne Benz Chipman

4 Carmen Plaza de Jennings
Jayne Benz Chipman

5 Attorneys for Defendants
6 THE FOOTHILL-DE ANZA COMMUNITY
7 COLLEGE DISTRICT, DE ANZA COMMUNITY
8 COLLEGE, LLOYD A. HOLMES, PATRICK
9 AHRENS, LAURA CASAS, PEARL CHENG,
10 PETER LANDSBERGER, GILBERT WONG AND
11 ALICIA CORTEZ, THOMAS RAY, CHRISTINA
12 ESPINOSA-PIEB, and LYDIA HEARN

11 Dated: September 18, 2023

ALLEN HARRIS PLLC

13 By: /s/Michael Thad Allen

14 Michael Thad Allen

15 Attorneys for Plaintiff TABIA LEE
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PLAZA DE JENNINGS & CHIPMAN LLP
ATTORNEYS AT LAW
ALAMEDA